

ORIGINAL INTERVENTION



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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

GARY PIERCE, Chairman

BOB STUMP

SANDRA D. KENNEDY

PAUL NEWMAN

BRENDA BURNS

IN THE MATTER OF THE APPLICATION
OF TUCSON ELECTRIC POWER COMPANY
FOR THE ESTABLISHMENT OF JUST AND
REASONABLE RATES AND CHARGES
DESIGNED TO REALIZE A REASONABLE
RATE OF RETURN ON THE FAIR VALUE
OF ITS OPERATIONS THROUGHOUT THE
STATE OF ARIZONA.

Docket No. E-01933A-12-0291

ARIZONA PUBLIC SERVICE COMPANY'S MOTION TO INTERVENE

Arizona Public Service Company (the "Company" or APS"), through undersigned counsel and pursuant to A.A.C. R14-3-105, hereby moves the Arizona Corporation Commission (the "Commission") for an order allowing APS to intervene in the above-captioned proceeding. In support of its motion, APS states as follows:

1. APS is a public service corporation providing electric service to customers within the state of Arizona.

2. APS is a wholesale supplier of electricity to Tucson Electric Power Company ("TEP") as well as an occasional purchaser of electricity from TEP, and also co-owns certain

1 generation and transmission facilities with TEP and thus has an ongoing and substantial
2 interest in the continued financial viability of TEP.

3 3. TEP has raised in its filing issues regarding the treatment of energy efficiency
4 expenditures and incentives, as well as the recovery of fixed costs associated with foregone
5 sales attributable to energy efficiency and distributed generation. The resolution of such
6 issues may affect APS not only as precedents for future Commission actions, but also in the
7 still open APS rate case docket (Docket No. E-01345A-11-0224).

8 4. The name, address, telephone number, facsimile number and e-mail address of
9 the attorneys for APS and others upon whom service of all documents is to be made are:

10 Thomas L. Mumaw
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12 Pinnacle West Capital Corporation
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15 5. No other party can represent APS's specific interests in these proceedings.

16 6. APS's intervention will not broaden the issues from those already raised by the
17 TEP application.

18 WHEREFORE, APS respectfully requests that the Commission grant its Motion to
19 Intervene in the above-captioned matter.

20 RESPECTFULLY SUBMITTED this 10th day of August, 2012.

21
22
23 By: 
24 Thomas L. Mumaw
25 Melissa Krueger

Attorneys for Arizona Public Service Company

26 ORIGINAL and thirteen (13) copies
27 of the foregoing filed this 10th day of
28 August, 2012, with:

1 The Arizona Corporation Commission
2 Hearing Division – Docket Control
3 1200 West Washington Street
4 Phoenix, Arizona 85007

5 COPY of the foregoing hand-delivered, e-mailed
6 or mailed this 6th day of August, 2012, to:

7 Lyn Farmer
8 Chief Administrative Law Judge
9 Arizona Corporation Commission
10 1200 West Washington Street
11 Phoenix, Arizona 85007

12 Steve Olea
13 Director, Utilities Division
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